



July 28, 2010

**VIA HAND DELIVERY**

Mr. Ken Harris  
*Interim Assistant Executive Officer*  
*California Regional Water Quality Control Board*  
Los Angeles Region  
320 West Fourth Street; Suite 200  
Los Angeles, California 90013

**RE: TENTATIVE CLEANUP AND ABATEMENT ORDER NO. RB4-  
2010-XXX**

Dear Mr. Harris:

Thank again you for meeting with some of the professional experts we have retained to evaluate the various sciences concerning the Carousel Housing Tract on July 20, 2010. You requested in that meeting a desire to obtain specific scientific conclusions in writing addressing specific areas of concern addressed in my earlier comment letter as they relate to each discipline of concern in the TCAO.

As predicted in my comment letter to you earlier this month, the data continues to roll in from URS/Shell and the Regional Board staff revealing evidence, along with the data sets referred to in the TCAO, that the contamination of the 55 acre site in Carson requires *at a minimum* serious immediate abatement of the petroleum and other chemicals of concern to protect the health and safety of the community.

Again, I must reiterate the two primary concerns with the TCAO: 1) The TCAO treats the 55 acre site as 285 subdivided parcels rather than a single operable unit; and 2) The TCAO seeks to only remediate 10 feet below grade.

**G K**

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Enclosed with this letter is a *Track Changes* version of the TCAO for your consideration, as well as three independent comment letters prepared by the team members you and your staff met with. An adopted Cleanup and Abatement Order has the ability to cause a know polluter to perform his duties under the law; while you cannot direct a specific remediation technique or direct a specific process, you can issue an order that is responsive to the needs of the people whom you are charged with protecting.

Sincerely,

**G I R A R D I | K E E S E**



THOMAS V. GIRARDI

TVG:cta

Enclosures

cc: Sam Unger  
Michael Leslie  
Jeffrey Dinzter